

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

EQUAL EMPLOYMENT OPPORTUNITY §
COMMISSION, §

Plaintiff, §

VS. §

CIVIL ACTION NO. 5:16-cv-00758

NABORS INDUSTRIES, LTD., §
NABORS INDUSTRIES, INC., §
NABORS CORPORATE SERVICES, INC., §
NABORS DRILLING TECHNOLOGIES §
USA, INC., C&J WELL SERVICES, INC., §
C&J ENERGY SERVICES, INC. AND §
C&J ENERGY SERVICES, LTD., §

JURY DEMANDED

Defendants §

DEFENDANTS C&J WELL SERVICES, INC. AND
NABORS CORPORATE SERVICES, INC.'S THIRD AMENDED
RULE 26(a)(1)(A) INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure, Defendants C&J Well Services, Inc. ("CJWS") and Nabors Corporate Services, Inc. ("NCS") make their Third Amended Initial Disclosures as follows:

- (i) The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Adam Crews
Duane Jewell
Tihiran Myers
Damon Parrish
Terence Smith
c/o EEOC
Dallas District Office,
San Antonio Field Office
5410 Fredericksburg Rd., Ste.200
San Antonio, Texas 78229

(817) 542-3370

Former employee of CJWS/NCPS; knowledge of her employment with CJWS/NCPS.

Josh Green

202 Cheyenne Rd., Unit A

Foss, OK 73647

Telephone number unknown

Former employee of NCPS; knowledge of complaints made against him by other NCPS employees.

Julia Wright

2445 Technology Forest Blvd., Building 4, Floor 9

The Woodlands, TX 77381

(281) 403-5748

Former employee of NCS; knowledge of complaints made by named individuals against CJWS/NCPS and investigation into same.

Katrina Montoya

c/o MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.

808 Travis, 20th Floor

Houston, TX 77002

Telephone: (713) 632-1700

Facsimile: (713) 222-0101

Employee of CJWS/NCPS; knowledge of her employment with CJWS/NCPS; alleged complaint allegedly made by Trevor Corley; layoff of Harold Taylor.

Leon Tovaas

135 Broken Star Trail

Poteet, TX 78065

(830) 569-7768

Former employee of CJWS/NCPS; knowledge of his employment with CJWS/NCPS.

Lester Johns

1612 Mason King

San Antonio, TX 78260

Telephone number unknown

Former employee of NCPS; knowledge of allegations made by named individuals, including Duane Jewell; knowledge of his former employment with NCPS and discipline received.

Lisa Snoga

524 Indian Crossing

Jourdanton, TX 78026

(210) 918-9811

Former employee of CJWS/NCPS; knowledge of her employment with CJWS and/or NCPS and complaints she made regarding named Plaintiff Tihiran Myers.

45. Odessa, Texas payroll report for various employees from October 2013 to May 2014

46. Job Packets

47. To the extent not already disclosed, any other documents already produced by Defendants or Plaintiff in discovery not named in this supplemental disclosure.

- (iii) **A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

Defendants are not seeking damages at this time.

- (iv) **For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

None.

Defendants reserve the right to amend or supplement their initial disclosures as permitted under the Federal Rules of Civil Procedure.

Respectfully submitted,

MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.

By: /s/ James M. Cleary, Jr.

James M. Cleary, Jr.

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Federal I.D. No. 15499

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ATTORNEYS FOR DEFENDANTS

NABORS CORPORATE SERVICES, INC.,

AND C&J WELL SERVICES, INC.